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EX PARTE OR LATE FILED

August 4, 1997

Mr. William Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20554

RECEIVED

AUG - 4 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Dear Mr. Caton:

Re: CC Docket No. 96-115

On July 31, 1997, the Association of Directory Publishers ("ADP") met with Patrick Donovan, Dorothy Attwood, Dave Konuch, Raelynn Tibayan Remy, and Lisa Choi of the Common Carrier Bureau and Paula Silberthau of the Office of the General Counsel to discuss the status of the above-referenced proceeding.

ADP also discussed its belief that the Eighth Circuit's decision in Iowa Utilities Bd. did not affect the Commission's authority with respect to subscriber list information issues. In support of its belief, ADP circulated the attached paper. ADP also circulated an attachment containing (1) local exchange carriers' telephone directory advertisements, (2) articles about BOCs' Internet directories, and (3) examples of telephone directories containing multi-state listings in a single directory. That attachment is appended to this filing.

Representatives of ADP included Rick Lewis, Jane Clark, Bill Hammack, Stephen Wiznitzer, Theodore Whitehouse, and the undersigned

cc of [unclear] sent  
LW ABOVE

024

Three Lafayette Centre  
1155 21st Street, NW  
Washington, DC 20036-3384  
202 328 8000

Telex: RCA 229800  
WU 89-2762  
Fax: 202 887 8979

Mr. William Caton  
August 4, 1997  
Page 2

Pursuant to the Commission's *ex parte* rules, copies of this submission are being filed with the Secretary's Office.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael F. Finn", written in a cursive style.

Michael F. Finn

Enclosures

CC Without Enclosures:

Dorothy Attwood  
Patrick Donovan  
Dave Konuch  
Raelynn Tibayan Remy  
Lisa Choi  
Paula Silberthau

**Lucent/AT&T**

- Definity
- System 75/85
- Legend
- Partner
- Merlin
- Spirit

Integrated voice mail  
for Definity, Merlin,  
Legend and Partner

Audio Conferencing System

**POLYCOM**

Power Protection Equipment

**APC**  
AMERICAN POWER CONVERSION

Regional Sales Manager  
**1-9363**

**INTERNATIONAL REAL ESTATE**

**The Corporation**  
**Memphis**

**Presentation Team of**

**ison, Sal Feraci**

**ronson and Feraci**

**is R. Liles**

**Engineering, LLC**

**. Wooldridge**

**lge Construction**

**ss to**

**Mayor of Memphis**

**and**

*SunShine Pages* partners with E.W. Scripps Co., the Cincinnati-based parent company of *The Commercial Appeal*.

You wouldn't expect something as workaday as yellow page listings and advertisements to generate as much of a stir among business owners, but for these entrepreneurs it is an important and expensive proposition.

"It's a very heated issue," says Susan Acuff, president of Acuff International.

Acuff is happy to see *The SunShine Pages*, which entered the market this year by offering free advertisements in the yellow page section.

"Hopefully it will bring down some of the prices of the (*Yellow Pages*) ads because they are astronomical," Acuff says.

She cites as an example a three-quar-

is advertising for the first time at a certain size, she says.

"There are so many deals it's like going to Tunica. They offer a first-time ad of a certain size at a certain price. Then the next year they jump that price up considerably and you either pay the higher price or drop the size of your ad," Acuff says. "It's quite a marketing strategy."

#### Errors in Ads Cited

While Acuff speaks well of the professionalism of the sales people and managers for the *Yellow Pages*, she also cites errors in ads and a high turnover among sales people.

All five business owners called at random had positive comments about the new *SunShine Pages* and the competition

See *SUNSHINE*, Page 32

## On-Line Directories Let Computer Keys Do the Walking for Telephone Information

By Leigh Ann Roman

IF YOU'RE SUCH A NETIZEN THAT you can't tear yourself away from the computer screen to look up a telephone number, not to worry.

The on-line counterparts of independent directory *The SunShine Pages* and *The Real Yellow Pages* from BellSouth offer Memphis-specific yellow page Web sites that allow you to check the number without leaving the Web.

You could check out <http://www.sunshinepages.com> or <http://www.yip.bellsouth.com>. The *SunShine* site offers all listings found in its print directory with mapping capabilities, as does the BellSouth directory. You can search by name of business, category or zip code.

*SunShine's* on-line directory also offers advertisers a free advertisement when they buy an ad in the print directory. Although print advertisements were free this year only in the *SunShine Pages*, they will be free on-line "for the long term," says Ken Bickford, director of new media at the *SunShine Pages*.

"What that gives us is a tremendous critical mass of data for Memphians who are trying to locate a dry cleaner or transmission repair shop or even sod and sodding services," he says.

The on-line directory has 2,700 free display ads for Memphis alone, Bickford says. That compares favorably with the entire service area for Nynex Corp., a regional bell operating company which offers about 10,000 paid display ads for its national on-line yellow pages, *Big Yellow*, he says.

"Citizens of Memphis, Tennessee, have more information about businesses in their community than possibly any other city in the world," Bickford says.

Some aspects of the *SunShine Pages* on-line are under construction including a list-

teller machine locations in Memphis," he says. They should be available in July.

Seattle, Wash.-based Infospace, Inc., a large aggregator of information on the Internet, recently purchased Ypi.Net a consortium of independent directory publishers who were pooling their database.

Because of that change, the Memphis *SunShine* site and others in that network will soon see additional information such as national residential listings, local residential listings a city guide and a national E-mail address service, Bickford says.

BellSouth's Memphis site already includes the E-mail service, city guide and local and national residential listings.

It also offers a special mapping capability that it allows the user to designate any address as a landmark and to search for businesses within a certain radius of that landmark, says Kevin Doyle, assistant director of media relations at BellSouth Corp.

Another significant feature of the BellSouth on-line directory is that it is updated every two weeks, Doyle says.

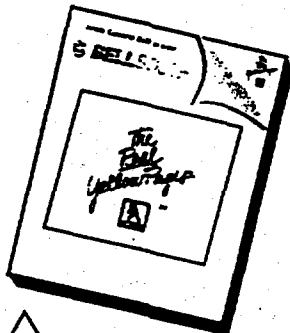
The regular updates and search capabilities make the BellSouth product stand out, Doyle says.

"The search capabilities are unsurpassed," he says. "I have not seen competitive products off the kind and depth of information about the community that we are able to provide."

Community information includes a broad range of information such as tourist attractions, utilities, voting information and a calendar of events.

BellSouth representatives began selling advertising for the on-line product in Memphis only recently, and they should begin appearing later this summer, says David Shippis, information product manager for BellSouth.

# ... Which Directory Is Best For You? ...



Ask your directory representative these questions before making your business decision.

**1**

**What plans do you have to promote and sustain usage?**

Real Yellow Pages: BellSouth spends millions each year in television, radio, billboards, etc. to educate the public on our product.

Other Directory: \_\_\_\_\_

**2**

**How will usage be measured?**

Real Yellow Pages: Usage is measured not only by in-house research, but also by well-known independent sources such as NYPM, National Yellow Pages Monitor, a syndicated research company.

Other Directory: \_\_\_\_\_

**3**

**What kind of syndicated data do you have to prove usage of your product?**

Real Yellow Pages: Through the above mentioned process comes great amounts of data which we share with each business person.

Other Directory: \_\_\_\_\_

**4**

**Can I talk with advertisers who have done business with your company?**

Real Yellow Pages: In our case, yes, almost every business has advertising in our product.

Other Directory: \_\_\_\_\_

**5**

**Is advanced payment required before the phone book is delivered?**

Real Yellow Pages: Typically, no. Your billing occurs monthly on your phone bill after the book is distributed.

Other Directory: \_\_\_\_\_

**6**

**How often will listings be updated?**

Real Yellow Pages: Once a year.

Other Directory: \_\_\_\_\_

**7**

**How many directories will initially be delivered?**

Real Yellow Pages: Everyone with a phone receives a BellSouth directory: Business and Residential.

Other Directory: \_\_\_\_\_



**What is the method of delivery?**

Real Yellow Pages: We contract Directory Distributors of America to insure everyone gets a directory.

Other Directory: \_\_\_\_\_



**How will you know about new businesses and residents; will they receive a copy?**

Real Yellow Pages: Anyone who sets up phone service, residential or commercial, receives a directory within 2-3 days throughout the year.

Other Directory: \_\_\_\_\_



**How will directories in hotels and motels be replenished?**

Real Yellow Pages: Once a year, books are delivered in bulk (normal distribution) with enough to replace lost or stolen books throughout the year.

Other Directory: \_\_\_\_\_



**Is there a contract to place the directories at pay phones?**

Real Yellow Pages: All BellSouth pay phones have BellSouth directories, which are replaced annually.

Other Directory: \_\_\_\_\_



**Do you require advertisers to have business/commercial phone service?**

Real Yellow Pages: BellSouth requires all listings be commercial to maintain the integrity and accuracy of our product.

Other Directory: \_\_\_\_\_



**Will the directory have a white page section with complete residential listings for the entire area?**

Real Yellow Pages: BellSouth updates residential listings in the white pages until publishing dates. This accuracy is rarely duplicated and it increases the user-friendly aspects of our product.

Other Directory: \_\_\_\_\_



**Is there a guarantee that a directory will be published and will it be on time?**

Real Yellow Pages: Some independent directories reserve the right not to print if deemed unprofitable or they will sell ads until specific profit margins are met, often delaying publishing for several months. BellSouth works on strict publishing schedules and is required to print a directory regardless of sales objectives.

Other Directory: \_\_\_\_\_



**If there is an error or complaint, who do I call and how will the problem be handled?**

Real Yellow Pages: BellSouth prints our business office lines in the front of each directory. We will route each of your calls to the proper representatives.

Other Directory: \_\_\_\_\_

# What You Need To Know When You're Buying Yellow Pages Advertising

## What You Need To Know When There's More Than One Directory Publisher



There are generally two types of directory publishers; one is affiliated with the local telephone company, such as BellSouth, the other is independently owned and operated. Advertising prices for the independent directories may appear competitive based on the size of the ad and the circulation of the directory. As with any advertising medium, however, you're not buying circulation, you're buying usage—and the two words are not synonymous.

Circulation refers to how many directories will be delivered initially.

Usage refers to how many people are using a particular directory and how frequently they use it.

The things you should take into consideration as you make your Yellow Pages advertising decision are:

- 1) How many people will actually use this directory?
- 2) Are people going to switch to a directory they're not accustomed to using?
- 3) How are different publishers proving the usage of their directories?

## Six Questions It's Always Wise To Ask:

- 1) How can I be sure which directory publisher I'm dealing with? Ask the salesperson for identification if you're not sure.
- 2) Will newcomers in the area receive copies?
- 3) How do I make a complaint in case of an error?
- 4) Is payment required in advance?
- 5) How long has the product been in existence and how often will it be published?
- 6) Can I talk to other advertisers who've been pleased with their results?

# There's a Stranger Coming to Town.

He's Out to get Your Money... and You Get Nothing, But a  
Higher Advertising Bill in Return

By WM. Jessen Editor

There is a stranger coming to town, and he's out to get you. This stranger is going to try to fool you by getting you to think he's your friend. He's going to try to convince you that the publisher you have used to advertise your business is weak and ineffective; and that his company is so big and strong, it will enable you to be much more successful than you are now.

In the course of this discussion, I will use three specific cases that are going on now - or are in the immediate plans of a system publisher (a system publisher, as opposed to an independent, is one who operates a phone system in addition to being a Yellow Pages publishing company).

I'm going to make a flat statement, and I'm sticking to it. "The Yellow pages publishing business is a zero sum business." That, my friends, is a very important thing to know and never forget. Zero sum means that the pie doesn't get any bigger (see chart on page #3). Reps will try to get you to forget it - by using their sales talents, their friendly personalities and anything else they can think of - to persuade you to sign in your company to advertise with

their Yellow Pages Directory in lieu of, or in addition to, your present Yellow Pages Directory.

But how can I say such a thing? Won't a new directory bring in new business? Not in my life time or yours! Always keep in mind one simple fact and that is, Yellow Pages Directories are passive forms of advertising; they only steer the customer, through various headings, to find what you have already decided you were looking for, *before* you even picked up the Yellow Pages Directory.

Let me illustrate it in this way. Publishers would have you believe that the Yellow Pages Directory is like a Sears Catalog. People thumb through it, see your ad and call you for your product or service, just like you might do while thumbing through the catalog - you see a dress that you can't live without or a fishing pole you've always wanted. Think about it, with Yellow Pages, it doesn't happen that way. Now, this is important! It is precisely for this reason that I can say that the Yellow Pages Directory is a zero sum game. Think of all the business produced by a single Yellow Pages Directory in a town we will call "Dodge City," USA. For clarity of argument, let's also say that there are

no other Yellow Pages Directories distributed in Dodge City, only the system directory, published by the local phone company. Anyone who lives in Dodge City that wants a product or service, and doesn't know where to find it, will, no doubt, pick up this local Yellow Pages Directory and decide who to call to provide that product or service. One day, a stranger walks into your business with a big smile on his face and says to you, "You are now going to have an option when deciding to place your Yellow Pages ad, because he represents the "American Dream" publishing company." They have decided Dodge City's public and business communities need a second choice when it comes to using the Yellow Pages Directory! The implication he gives is that, by signing up to place an ad in the American Dream Directory, your business will somehow be better off than ever before - because you now have a choice. He might even offer a free ad in the initial directory (this is called a prototype directory), or he may offer you a much better price, for the first year, than you are now getting, if you will only advertise in the American Dream Directory.

If you fall for this line of hawwash.

you may certainly regret it, for several reasons: #1 Where are all these additional business calls coming from? With only one directory in Dodge City, you are already receiving all the calls you might expect to receive - based on your ad placement, ad size, ad content, the use of RCF numbers and a host of variables, including how many years you have been an advertiser. #2 If the American Dream publishing company has their way, there will be two directories in every home & business, and if you only have an ad in one of these directories, *and someone picks up the directory you're not in*, you aren't even going to be considered as a choice, regardless of how good your ad may, or may not, be.

So now you decide that you must be in both directories because you have no way of getting the potential customer to pick up the only directory you have chosen to be in. Logically, you decide that you must be in both directories to insure an equal shot at the customer choosing your ad to call. However, now you have a problem you have never had before. Remember when the American Dream rep walked into your business and told you that you were paying too much for your ad in the local Yellow Pages Directory? #3 Well, now you have to pay for the American Dream ad and the ad in the old directory! In effect, you have dramatically increased your advertising cost, and have no additional business to pay for it. That American Dream salesman really was a good salesman, wasn't he?

Zero sum means that the pie doesn't get bigger. If you find you are doing more business with the two ads, then someone else is - without question - doing less business, and even if you're one of the lucky ones to be doing more business, you still have dramatically increased your advertising costs.

## **See Graphic Chart Illustration On Page 3**

So who really is giving you the business? Isn't it the American Dream Directory Publishing Company?

The only way to fight this situation is not to fall for their line, in the first place. Sure, they may offer you a free ad or cheaper ad than you are now paying for with the old Yellow Pages Directory, but is it cheaper - when you find out that you now have to be in both books to receive the same number of calls?

If you are fortunate enough to live in a city or town that still only has one directory, don't complain about what you are paying for your Yellow Pages ad - the American Dream directory may have plans that could change that for you.

What can you do to stop this from happening in your city or town? Simple - you must do two things!

#1 When the rep from a new directory walks in or calls you on the phone to offer you a "free" or a greatly reduced priced ad, simply remember it's not really free or cheaper - it comes with a big hook.

#2 You must tell your friends who are in business not to fall for this line, and tell them why - in no uncertain terms. They don't expect everyone to say "No", so they will keep offering their story until enough people say "Yes". It's very hard for people to say "No" to a free ad, or to an ad at 40 to 70% off the first year. If you've done any fishing, you know that you are just trying to get the fish to check out what you are offering him, so you can set the hook, deep! You don't have to be worried about being the one that got away, if you don't nibble at the bait.

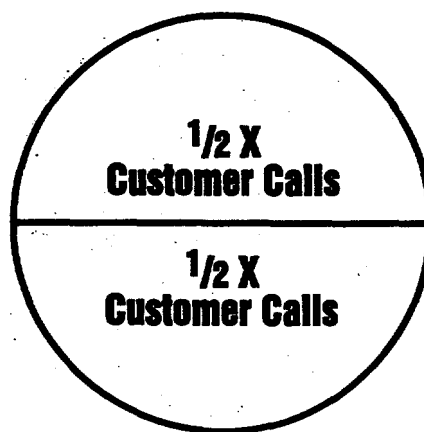
Don't get me wrong - I love Yellow Pages advertising. My entire company couldn't exist without the Yellow Pages. I think that Yellow Pages are about the greatest books ever published for the purpose of business. I also believe that, if a little bit of something is great, it doesn't necessarily follow that a lot of the same thing will be even better. A little bit of sugar or cream in your tea or coffee may be good, but a lot would be ghastly. A little bit of insulin to a diabetic is life saving, but a lot would probably kill him or her.



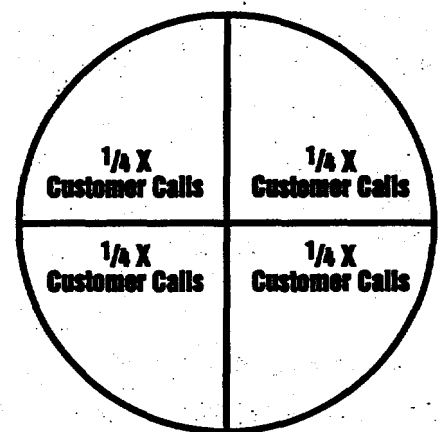
# **The Zero Sum Game, Played by Yellow Pages Publishers. More Directories Do Not Mean More Calls. You'll Always Lose!**



**100% of the calls produced by advertising, when there is only one published directory in an area.**



**Two Publishers dividing up this pie. You will get approximately the same number of calls - at twice the price. Such a deal!!!**



**Four Publishers slicing up this pie. Now it could cost you four times as much for the same number of calls. Makes you want to run right out and sign up, doesn't it?**

**The Zero Sum Game is being played by  
Yellow Pages Publishers.**

**You must fight this system with everything you have!  
You must do more than refuse to play, or they still win!**

I believe a case can be made for the need for small, independent publishers or neighborhood books to support small businesses in a local area. They are always very inexpensive (compared to the system books or large independents), so most small businesses that do business in a limited geographic area are well served by them.

Now, let's deal with some specific cases of intrusions by system publishers or large independents into other system areas that would bring the aforementioned about, or situations that are now in progress.

In Everett, Washington, the system book is GTE. US West is coming to town to sell all of GTE's customers a new ad in a new directory. If you allow US West to have their way, all of the inhabitants of, not just Everett, but Marysville, Arlington, Camino Island, Lake Stevens, Monroe, Snohomish, Silverlake, Mill Creek and many others will soon be the "proud" recipients of the new "Everett and Vicinity" US West Yellow Pages Directory. And then, the fun will begin for you. Two directories to pay for. Instead of just one. Isn't that a great deal? Especially since you're not going to receive any more calls, unless someone else gets less calls. When you're calculating all the savings you will be getting by advertising in this new directory, you would be wise to subtract all the business you will lose by customers not finding you in the old directory, because they may call someone else.

playing - more directories do not bring more calls with them, they simply give you fewer in each directory than you would have had with one directory; and, as an added bonus for being taken in, you get to double your advertising costs. If not the first year, then when they raise their directory to its normal competitive price. (Depending on your ad size choice.) Isn't this exciting?

In Northern California, a company called Great Western Directories is overlaying the area of the system book, which happens to be Pacific Bell. Is turnabout fair play? Not really, because remember zero sum publishing? No more calls come from these new directories, only new advertising bills. Great Western Directories is well on the way to accomplishing its goal. It uses the expensive, but very effective "Prototype" method for starting a new directory. They give you a free ad in the first directory, and then come back and set the hook. Its works - for them.

A third publisher that comes to mind, when I'm talking about expanding one's territory, is Valley Yellow Pages. They, for the most part, overlay Pacific Bell's territory - starting from Bakersfield, Fresno, Stockton and a recent one, I believe, in Fairfield, California.

Not to be left out of this overlay expansion process is Pacific Bell. As I understand it, Pacific Bell is now going to publish new directories

Southern California - starting with Santa Barbara and moving East all the way to Ontario, CA. Just what we need - in what is already phone book heaven. I can't imagine a home or business in Southern California with less than 5 or 6 Yellow Page Books already.

Remember, zero sum publishing. No more calls, but guaranteed higher advertising bills.

A variation of the zero sum game is also being played on the publishers as well. Think about it. Every time a publisher overlays an area with another unnecessary directory, he weakens every Yellow Pages advertiser in that area. As anything gets weaker, it tends to eventually reach a breaking point; and, then, there is one less advertiser to support a self-destructive system. But the publishers will say that it's a free market system, and so it is. But they are the ones that keep crying about zero or negative growth; some have called it a "matured" market. The publishers can't have it both ways. If they want to see positive growth, they have to stop increasing the advertising cost burden of their advertisers, without compensating them with new business - and that, they cannot do.

Don't ever think for a moment that publishers who flood your areas with directories are your friends - because they are not! They are businessmen pursuing their American dream, and I can't fault them for that. But be warned, zero sum publishing works

# THE ONE BOOK

1995

SINCE 1886



# DISTRICT OF COLUMBIA

*COMPLETE*

## YELLOW PAGES

From **A to Z** for all of  
**The District of Columbia**

Including Business White Pages

Additional Yellow Pages Listings For:

**METROPOLITAN  
WASHINGTON**

*FEATURING*

## SHOPPING MALL GUIDE

See "Shopping Centers & Malls"  
in the Yellow Pages of this Directory

*INTERACTIVE*

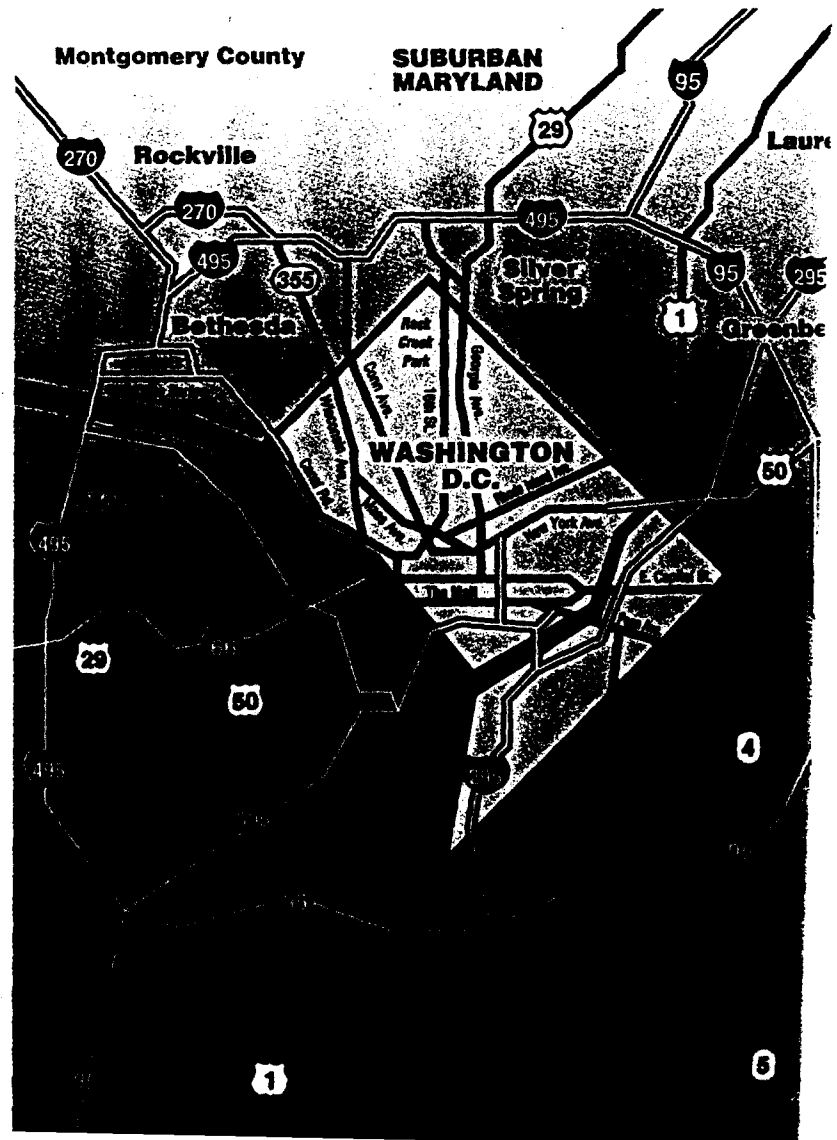
## **FREE\* INFORMATION FROM YOUR PHONE!**

Updates on News, Sports, Weather, Soap Operas,  
Horoscopes, and More... see pages 2 and 3.

\*Within local calling area

Recycling Information Immediately  
Following White Pages Section

Reuben H. Donnelley  Recyclable



## 201 RYON-SAFEWAY

Sachs Harry R	1250 I St NW	682-0240
Ros 2934 Newark St NW		242-8150
Sackotto Kara M	607 14th St NW	622-6600
Sack Lawrence C	MD 2801 Connecticut Av NW	363-9862

Sachse Harry R hwy 1250 I St NW - - - - - 682-0240

[illegible]

# Bell Atlantic

**YELLOW PAGES**



## istrict of Columbia

ides White Pages Business Listings Area Code 202

May April  
**1996-1997**



**NEW: Interactive Services!**

- InfoTips in English and Spanish
- Consumer Information at Your Fingertips

## ► AUTOMOBILE HAND & FOOT CONTROLS

**AREA ACCESS INC**  
MPD Hand Controls-Lift Foot Gas  
8117RanneyRd Falls Church — 703 573-2111

**AREA ACCESS OF BALTIMORE**  
3741 Old Georgetown Rd Baltimore — 410 536-4111

**BEDCO MOBILITY INC**  
Washington's Leading Driving Aids Dealer  
2317 Old Baltimore Cir Silver Spring — 301 585-0700

**IRONSIDES MOBILITY SYSTEMS**  
Full Line Of Driving Aids For The Handicapped  
3057 First St Rockville — 301 279-5855

## ► AUTOMOBILE INSPECTION STATIONS

**AUTHORIZED MARYLAND INSPECTION STATIONS—**  
**PRINCE GEORGES COUNTY**

**CHEVY CHASE CARS INC**  
7725 Wisconsin Av Bethesda — 301 657-4000

**COLLEGE PARK EXON SERVICENTER**  
AAA Approved Auto Repair  
ASE Certified Technicians  
7110BaltimoreBld College Park — 301 864-3400

**BROOKLAND EXON**  
ASE Certified Mechanics  
Free Wash With Full Oil  
DC Re-Inspection  
1020MicheganAve — 526-9430

**COLLEGE PARK EXON SERVICENTER**  
ASE Certified Technicians  
Maryland State Authorized Inspection Station  
7110BaltimoreBld College Park — 301 864-3400

**DISCOUNT EXHAUST AND TIRE CENTER**  
11111GreenbeltAve — 399-7900

**LAUREL AUTO BODY**  
3361PohamRd Laurel — 301 498-4900

**MARYLAND INSPECTION STATIONS—**  
**CHEVY CHASE EXON STATION**  
8505ConnAv ChCh — 301 654-8234

**Parts USA**  
5601GeorgiaAvNW Washington — 541-0088

Go to the  
Green Page\$  
for  
Money-Saving  
Coupons

Green Pages  
Coupons

© Bell Atlantic

YELLOW PAGES

When you see  
the green  
it means  
great savings  
for you

Green Pages  
Coupons

© Bell Atlantic

YELLOW PAGES

## ► AUTOMOBILE LEASING

FREE!

**InfoTips**<sup>SM</sup>

A product of Bell Atlantic

CALL

628-0202

THEN ENTER THE CODE FOR  
CONSUMER INFORMATION ON:

Why Lease? **8040**

Where To Lease **8041**

Leasing Tips **8042**

Insurance **8043**

**ALLSTATE LEASING INC**  
Since 1969  
We Service What We Lease  
16045ShadyGroveRd  
Gaithersburg — 301 948-1700

**AL'S MOTORS INC**  
2 Blocks From Ballston Metro Ten Minutes From DC  
3910WilsonBld Arlington — 703 522-4100

**AMERICAN SERVICE CENTER—MERCEDES-BENZ**  
FACTORY AUTHORIZED LEASING  
MERCEDES-BENZ • BUICK  
ISUZU  
3 Blocks From Ballston Metro  
Near Rt 66 Fairfax Dr & Glebe Rd Exits  
703 525-2100  
585 N Glebe Rd Arlington — 703 525-2100

**Anacostia Leasing Corporation**  
Washington — 889-1045

**ARROW CAR & TRUCK RENTAL**  
1720NewYorkAve — 636-8470

**ARROW LEASING**  
3210RhodeIslandAv McLean — 301 927-0012

**ASSET MANAGEMENT & RECOVERY INC**  
Management Of Auto Loans & Leases  
McLean VA — 703 448-1230

**AUDI LEASING—**  
AUTHORIZED DEALERS  
**HEISHMAN'S PORSCHE AUDI**  
3100JeffersonDavisHwy  
Arlington — 703 684-6660

## B C LEASING ASSOCIATES

### MORE FOR LEASE

BUSINESS & CONSUMER  
LEASES  
CARS, TRUCKS, AND VANS  
ACCURATE QUOTES BY PHONE  
NO MONEY DOWN  
INDEPENDENT COMPANY  
Established 1980

**BC LEASING ASSOCIATES**  
(301) 933-8855

3930 Knowles Av Kensington — 301 933-8855

## BMW AUTHORIZED AUTO LEASING—

**HEISHMAN'S BMW**  
3154JeffDavisHwy  
Arlington VA — 703 684-8500

*Fitzgerald*  
**EXECULEASE**

Executive service and competitive rates  
on all makes and models

**301-670-0091**

905 N. Frederick Avenue (Route 355) • Gaithersburg, MD

**Thrifty**  
Car Rental

Lease Too Long...?

**Rent it!**

METRO AREA

(202) 783-0400



1-12 Month  
Terms  
Available

For Worldwide Reservations Call 1-800-FOR-CARS™ (1-800-367-2277)

Thrifty features quality products of the Chrysler Corporation and other fine cars. A Licensee of Thrifty Rent-A-Car System, Inc.

## AUTOMOBILE LEASING (Cont'd)

### BUICK DEALER LEASING

TAKE COMFORT IN  
LEASING QUALITY  
AUTOMOBILES.



"FOR INFORMATION CALL"

**WASHINGTON**  
**CHEVY CHASE BUICK INC**  
5220WisconsinAvNW — 537-1300

**ALEXANDRIA**  
**TEMPLE MOTOR CO INC**  
499 S PickettSt Alexandria — 703 370-7211

**ARLINGTON**  
**AMERICAN SERVICE CENTER**  
**BUICK-ISUZU**  
624-640 N GlebeRd Arlington — 703 243-4000

## AUTOMOBILE LEASING (Cont'd)

### CADILLAC DEALER LEASING

AMERICA'S  
LUXURY LEADER



"WHERE TO CALL"

**ALEXANDRIA VA**  
**LINDSAY CADILLAC COMPANY**  
1525KenwoodAve Alex — 703 998-6600

**BETHESDA MD**  
**JIM COLEMAN CADILLAC**  
Factory Authorized Cadillac Dealer  
We Service What We Lease  
10400AutoParkAv Bethesda — 301 469-6600

**GAITHERSBURG**  
**ROSENTHAL HOFF CADILLAC**  
**BUICK ISUZU**  
623 N FrederickRd Gaithersburg — 301 670-4900

**GREENBELT MD**  
**CAPITOL CADILLAC COMPANY**  
6500CapitolDr Greenbelt — 301 441-9600

**VIENNA VA**  
**MOORE CADILLAC COMPANY**  
Potomac Leasing Inc  
8595LeesburgPike Vienna — 703 790-0950

## CHEVROLET/GEO DEALER LEASING—

**BETHESDA MD**  
**CHEVY CHASE CARS INC**  
7725WisconsinAv Bethesda — 301 657-4000

**SILVER SPRING MD**  
**SPORT CHEVROLET**  
3101AutomobileBlvd  
SilverSpring — 301 890-6000

CONTINUED NEXT LISTING PAGE

Why Not Let The Yellow Pages Do Your  
Sales-Building? Call Your Yellow Pages  
Sales Representative For Information About  
Advertising In This Directory. Wise  
People In A Buying Mood Refer To The  
Yellow Pages. Your Product Or  
Service Will Get Their Attention. When They  
Are Ready To Buy. Use The Yellow Pages.  
It Helps You Get A Larger Share Of Your  
Neighborhood Business.

onal Capital Sleep Center  
4520 East West Hwy Beth --- 301 656-9515

onal Capital Speech's  
sociation Wash DC --- 898-7837

onal Capital Tay-Sachs  
Foundation  
5511 Thornbush Ct Bethesda --- 301 897-9722

onal Capital Texas A & M Club  
Washington DC --- 637-0102

onal Capital YMCA  
1711 N St NW --- 862-9622

onal Capital Area Federation Of  
Arden Cities Inc 3402 R St NE --- 399-5958

onal Capital Area Health Care  
Coalition 1281 Pa Av NW --- 626-6813

onal Capital Area Political  
Science Association  
1527 NW Ave NW --- 483-2512

onal Capital Chapter Of AAIM  
Wash DC --- 338-2446

onal Capital Chapter Of AAIM  
Wash DC --- 338-2446

onal Capital Financial  
Corporation  
3694 Prospect St NW Wash --- 338-4467

onal Capital Homes Development  
Corp 3380 R St NE --- 635-0522

onal Capital Homes Development  
Corp 3328 Owen Rd NE --- 563-0456

onal Capital Homes Development  
Corp 3339 7th St SE --- 563-0457

onal Capital Industries  
3428 Northwest Blvd Washington --- 301 864-4150

onal Capital Legal Group  
3281 NW Ave NW --- 364-0197

onal Capital Reciprocal Insurance  
Company Sponsored By The  
Federal Society Of The District Of  
Columbia 1707 L St NW --- 466-1830

onal Captioning Institute Inc  
700 Gallows Rd Vienna ---  
Voice --- 703 917-7600  
TTY --- 703 917-7600

**TIONAL CAR RENTAL  
ENTERPRISE**  
/for/lease Reservations  
Toll Free-Dial "1" & Then --- 800 227-7368  
/ash Natl Airport --- 783-1590  
/ash Natl Airport --- 783-1591  
/ash Natl Airport --- 703 471-5278  
/at Manassas/Ave NE --- 842-7454

onal Career And Counseling  
services 1511 K St NW --- 463-7544

**TIONAL CATHEDRAL** --- See  
/Washington National Cathedral

onal Cathedral Museum Shop  
/very Chase Pavilion  
5235 W Ave NW --- 537-3641

onal Cathedral School For Girls  
609 Woodley Rd NW ---  
For Offices Not Listed Below --- 537-6300  
Academic Office/Upper School --- 537-6366  
Admissions Office --- 537-6374  
Alumni Development Public Affairs --- 537-6348  
Business Office --- 537-6335  
Headmistress --- 537-6334  
Lower School --- 537-6315

onal Cathedral School Tennis  
Club --- 537-6350

onal Catholic Conference For  
Interreligious Justice 3033 4th St NE 529-6480

onal Catholic Educational Assn  
1877 30th St NW --- 337-6232

onal Catholic Evangelization  
Assoc 3831 4th St NE --- 832-5023

onal Catholic Office For Persons  
With Disabilities 401 Mich Ave NE --- 529-2933

onal Catholic Reporter  
1293-N Hall Press Building --- 662-7191

onal Catholic Society For Animal  
Welfare 421 S State St  
Chris Summit Pl --- 717 586-2200

onal Catholic Stewardship  
Council 1275 K St NW --- 289-1093

**TIONAL CATHOLIC WELFARE  
CONFERENCE** --- See United States  
Catholic Conference

onal Cattlemen's Association  
1381 Pa Av NW --- 347-0228

onal Cattlemen's Association  
News Bureau 1800 One Ave NW --- 296-4499

onal Caucus And Center On Black  
Aged Inc 1424 K St NW --- 637-8400

onal Caucus On Black Aged  
Elders 2801 14th St NW --- 387-4022

onal Celebration Of The  
Outdoors 1230 24th St NW --- 293-4800

onal Cellular Resellers  
Association 1225 L St NW --- 429-2014

onal Center Contraternity Of  
Christian Doctrine  
1312 Mass Ave NW --- 659-6860

onal Center For Business Study  
5018 W Ave NW --- 895-2686

onal Center For Citizen  
Involvement  
1111 N 19th St Arl --- 703 276-0542

National Center For Clinical Infant  
Programs 2000 14th St N Arl --- 703 528-4300

National Center For Community Risk  
Management & Insurance  
1001 Conn Ave NW --- 785-3891

National Center For Education  
Information Washington DC --- 362-3444

National Center For Employee  
Ownership  
2201 Broadway Oakland CA --- 510 272-9461

National Center For Environmental  
Health Strategies  
1100 Rural Av Voorhes NJ --- 609 429-5358

National Center For Food And  
Agricultural Policy 1616 P St NW 328-5048

National Center For Housing  
Management Inc  
1810 Mass Ave NW --- 672-1717

National Center For Improving  
Science Education The  
2000 L St NW --- 467-0652

National Center For Job Market  
Studies The Beth MD --- 301 229-4885

National Center For Learning Disability  
1333 H St NW --- 789-1505

National Center For Manufacturing  
Sciences 201 Mass Ave NE --- 544-9244

National Center For Missing and  
Exploited Children  
Holding  
Toll Free-Dial "1" & Then --- 800 843-5678  
Business --- 703 235-3900

National Center For Municipal  
Development Inc 1620 L St NW --- 429-0160

National Center For Neighborhood  
Enterprises 1367 Conn Ave NW --- 331-1103

National Center For Non-Profit  
Law 2001 S St NW --- 462-1000

National Center For Nonprofit  
Boards 2000 L St NW --- 452-6262

National Center For Organizational  
Improvement --- 723-1100

National Center For Policy Analysis  
777 15th St NW --- 628-6671

National Center For Preservation  
Law 1333 Conn Ave NW --- 338-0392

National Center For Public Policy  
Research Inc 300 L St NE --- 543-1286

National Center For Redress Of Incest  
& Sexual Abuse 1858 Park Rd NW 667-1160

National Center For Small  
Communities 1522 K St NW --- 737-5200

National Center For Sports Medicine  
2445 Army Navy Dr Arl --- 703 769-8486

National Center For State Courts  
1700 N Moore St Arl --- 703 841-0200

National Center For Tenant  
Ownership 777 N Cap St NW --- 371-9200

National Center For The Treatment Of  
Phobias Anxiety And Depression  
1755 S St NW --- 363-3900

**NATIONAL CENTER FOR THE  
TREATMENT OF PHOBIAS  
ANXIETY AND DEPRESSION**  
1755 S St NW --- 363-7792

National Center For Therapeutic  
Riding 5115 Glover Rd NW --- 966-8004

National Center For Urban Ethnic  
Affairs 620 Mich Ave NE --- 232-3600

National Center On Education And  
The Economy 700 11th St NW 783-3668

National Center On Institutions And  
Alternatives  
635 Statens Lane Alex --- 703 684-0373

National Center To Rehabilitate  
Violent Youth 1730 K St NW --- 293-2898

National Certification Board For  
Therapeutic Massage & Body  
Works 1735 N Lynn St Arl VA --- 703 524-9563

National Chamber Foundation  
1615 H St NW --- 463-5552

National Chamber Litigation Center  
1615 H St NW --- 463-5337

National Chamber Of Commerce For  
Woman New York City NY --- 212 532-6408

National Chamber Of Commerce For  
Women New York City NY --- 212 685-3454

National Chamber Orchestra Society  
850 Avery Rd Rockvl --- 301 762-8580

National Charities Information  
Bureau Inc  
19 Union Sq W New York NY --- 212 929-6300

National Check Cashing  
2337 Pa Av SE --- 581-2198

National Chinese Institute  
1250 H St NW --- 737-4332

National Chemical & Plastics Co The  
3610 Milford Rd Balto Md --- 410 655-0400

National Cherry Blossom Festival  
Committee Washington DC --- 547-1500

National Child Day Care Assn  
Annetta Harmon Day Care Center  
2625 Evans St NE --- 526-1496

Arthur Capper 1000 5th St SE --- 546-3674

Gibson Place 1301 7th St SE --- 232-4451

Lincoln Temple 1701 11th St NW --- 387-6724

Ludlow-Taylor After School  
6th & G Sts NE --- 547-2616

Mr Moriah 1634 East Capitol St --- 543-6795

Continued—See next column

Continued—From Previous Column

National Child Day Care Assn  
Lincoln West Moreland 1734 7th St NW 387-3700

Sargent Memorial  
5109 Hammie Helen Burghs Av NE --- 399-1434

Montgomery Ben School  
P St 5th & New Jersey Av NW --- 265-6418

Village Day Care Center The  
2000 14th St NW --- 234-5114

Wheatley After School  
Montello Av & Neal St NE --- 396-5679

Wilson After School 6th & K Sts NE --- 544-5137

**NATIONAL CHILD RESEARCH  
CENTER** 3209 Highland Pl NW --- 363-8777

National Child Support Enforcement  
Association 444 N Cap St --- 624-8180

National Childrens Center Inc  
3400 Martin Luther King Jr Av SE --- 279-4900

**NATIONAL CHILDRENS  
CENTER INC** 6200 2nd St NW --- 722-2300

National Children's Island Inc  
1025 W Ave NW --- 727-3045

National Chimney Supply  
6219 Howard Av Kans --- 301 897-8481

National Chinese Service  
Corporation  
601 Pa Av NW Wash DC --- 434-8187

National Chiropractic Clinic  
916 19th St NW --- 293-0498

National Christ Child Society  
5181 W Ave NW --- 363-9516

National Citizens Coalition For  
Nursing Home Reform  
1424 14th St NW --- 332-2275

National Citizens Committee For  
Broadcasting Washington DC --- 462-2520

**NATIONAL CITY CHRISTIAN  
CHURCH** 14th & Mass Av NW --- 232-0323

National Claim Adjusters  
Tl Pt Md --- 301 270-0044

National Classification Board  
2200 Mill Rd Alex --- 703 838-1810

**NATIONAL CLEANERS**  
3018 1st St NW --- 726-1094

National Clearing House For Bilingual  
Education 1118 22nd St NW --- 467-0867

National Clearing House For  
Corporate Matching Gift  
Information The 11 Dupont Circle --- 328-5900

National Clearinghouse For Drug  
Abuse Information  
5600 Fishers Ln Rockvl --- 301 443-6500

National Clearinghouse For Mental  
Health Info  
5600 Fishers Ln Rockvl --- 301 443-4513

National Clearinghouse On Literacy  
Education 1118 22nd St NW --- 429-9292

National Club Association  
3059 K St NW --- 625-2080

National Coal Association  
1130 17th St NW --- 463-2625

National Coalition Against Domestic  
Violence Washington DC --- 638-6388

National Coalition Against Surrogacy  
The 1660 L St NW --- 466-2823

National Coalition Against The  
Misuse Of Pesticides 701 E St SE 543-5450

National Coalition Building Institute  
National Office 1835 K St NW --- 785-9400

National Coalition For Adult  
Immunization  
4733 Beth Av Beth --- 301 656-0003

National Coalition For Advance  
Manufacturing 529 14th St NW --- 662-8960

National Coalition For Consumer  
Education Inc  
295 Main St Madison NJ --- 554-3770

National Coalition For Heritage Areas  
--- 673-4204

National Coalition For Homeless  
Veterans 918 Pa Av SE --- 546-1969

National Coalition For Science &  
Technology 2000 P St NW --- 833-2326

National Coalition For The Homeless  
1612 L St NW --- 775-1322

National Coalition For Universities In  
The Public Interest 1806 T St NW 234-0041

National Coalition Government Of  
The Union Of Burma  
815 15th St NW --- 393-7342

National Coalition Institute-Metro DC  
Chapter 1835 K St NW --- 785-3450

National Coalition Of Black Meeting  
Planners The Washington DC --- 628-3952

National Coalition Of ESEA Title I  
Parents 9th & D Sts NE --- 547-9286

**NATIONAL COALITION OF  
HISPANIC HEALTH & HUMAN  
SERVICES ORGANIZATION**  
1501 18th St NW --- 387-5000

National Coalition Of Hispanic Health  
And Human Services Organization  
1501 18th St NW --- 387-5000

National Coalition Of Petroleum  
Retailers 1300 L St NW --- 962-3864

National Coalition Of State Juvenile  
Justice Advisory Group  
1211 Conn Ave NW --- 467-0864

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National Coalition Of State Juvenile  
Justice Advisory Group Inc  
1211 Conn Ave NW --- 887-0738

National Coalition On Black Voter  
Participation Inc 1829 K St NW --- 659-4929

National Coalition On Ergonomics  
Washington DC --- 293-3384

National Coalition On Indoor Air  
Quality The 1518 K St NW --- 628-5336

National Coalition To Abolish The  
Death Penalty 918 F St NW --- 347-2411

National Coalition To Ban Handguns  
--- 488-5600

National Coalition To Prevent  
Impaired Driving 1707 L St NW --- 659-0054

National Collaboration For Youth  
1319 F St NW --- 347-2080

National College Of Advocacy  
1050 31st St NW --- 965-3500

National Collegiate Athletic  
Association 1 Dupont Cir NW --- 293-3050

National Color Inc  
8350 Greenboro Dr McLean --- 703 734-2803

National Commerce Exchange  
1801 Lohrville Ct Springfield --- 703 971-0800

National Commission Against Drunk  
Driving 1900 L St NW --- 452-6004

National Commission For  
Certification Of Acupuncturists  
1424 16th St NW --- 332-4585

National Commission For  
Certification Of Acupuncturists Inc  
1424 16th St NW --- 232-1404

National Commission For Certifying  
Agencies 1280 19th St NW --- 857-1165

National Commission For Economic  
Conversion & Disarmament  
1828 Jerald Pl NW --- 728-0815

National Commission Of Working  
Women --- 737-5764

National Commission On Children  
--- 254-3800

National Commission On Economic  
Growth & Tax Reform  
1133 Conn Ave NW --- 775-2375

National Commission On Gang  
Violence 1417 N St NW --- 588-8587

National Commission On Judicial  
Discipline And Removal  
2108 Pa Av NW --- 254-8169

National Commission on Libraries  
and Information Science  
1110 W Ave NW --- 606-9200

National Committee For Citizens In  
Education 1875 Conn Ave NW --- 462-7688

National Committee Against  
Repressive Legislation  
3321 12th St NE --- 529-4225

National Committee For Adoption  
1930 17th St NW --- 328-1200

National Committee For An Effective  
Congress 122 C St NW Wash --- 639-8300

10 E 39th New York City NY --- 212 686-4905

National Committee For Citizens In  
Education 418 Wide Lake Village Green  
Columbia MD --- 301 596-5300

National Committee For Human Life  
Amendment Inc 1511 K St NW --- 393-0703

National Committee For Pacific  
Economic Coop 1755 Mass Ave NW 745-7444

National Committee For Quality  
Assurance 2000 L St NW --- 955-3500

**NATIONAL COMMITTEE FOR  
QUALITY HEALTH CARE**  
1500 K St NW --- 347-5731

National Committee For Radiation  
Victims 6935 Laurel Av Tl Pt Md  
Wash Tel No --- 775-8786

National Committee For Responsive  
Philanthropy 2001 S St NW --- 387-9177

National Committee For The  
Prevention Of Alcoholism  
6830 Laurel St NW --- 722-6730

National Committee Of Women For  
Democratic Iran Washington DC --- 726-3653

National Committee On Pay Equity  
1126 16th St NW --- 331-7343

National Committee On Public  
Employee Pension Systems  
1221 Conn Ave NW --- 293-3960

National Committee To Preserve  
Social Security & Medicare  
2000 K St NW --- 822-9459

National Committee To Prevent Child  
Abuse DC Chapter Washington DC --- 223-0020

National Community Action  
Foundation 2100 M St NW --- 775-0223

National Community AIDS  
Partnership 1400 L St NW --- 408-4848

National Community Church On  
Capitol Hill Wash DC --- 537-1111

National Community Development  
Assist Centers Inc 2146 Ga Av NW 797-3900

National Community Development  
Association 522 21st St NW --- 293-7587

NATIONAL C—NATIONAL C

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National Community Education  
Association  
3929 Old Lee Hwy Fairfax --- 703 359-8973

National Community Reinvestment  
Coalition 1875 Conn Ave NW --- 966-7898

National And Community Service  
Coalition 409 3rd St SW Wash  
National Computer Security  
Wash DC --- 364-8252

National Computer Security  
Association Omni Shore  
--- 328-9138

**NATIONAL COMPUTER  
SYSTEMS MARKETING**  
Government Marketing Division  
4601 N Fairfax Dr Arl --- 703 516-4306

National Computer Warehouse  
1810 Edwin St NW --- 526-0008

National Computers  
1810 Edwin St NW --- 526-0008

National Con-Serv Inc  
451 Hingford Dr Rockvl --- 301 251-1880

National Concrete Masonry  
Association  
2302 Huxon Pk Rd Herndon --- 703 713-1900

National Confectioners Association  
7900 Westpark Dr McLean --- 703 790-5750

National Conference Of Artists  
409 7th St NW --- 393-3116

National Conference Of Catechetical  
The 3021 4th St NE --- 636-3826

National Conference Of Catholic  
Bishops  
3211 4th St NE ---  
For Numbers Not Listed Below Call --- 541-3000  
Office Of The General Secretary --- 541-3100  
American Board Of Catholic Mission --- 541-3010  
African American Catholics --- 541-3177  
Catholic-Jewish Relations --- 541-3005  
Catholic Telecommunications Network Of  
America --- 541-3444  
Committee On The Pastoral Response To  
Women's Concerns --- 541-3009  
Ecumenical & Interreligious Affairs --- 541-3020  
Human Resources --- 541-3120  
Liturgy & Family Life --- 541-3040  
Latin America --- 541-3050  
Liturgy --- 541-3060  
Doctrine & Pastoral Practices --- 541-3015  
Permanent Diaconate --- 541-3038  
Priestly Formation --- 541-3033  
Priestly Life & Ministry --- 541-3036  
Pro Life Activities --- 541-3070  
Media Relations --- 541-3200

**NATIONAL CONFERENCE OF  
CATHOLIC BISHOPS** --- See United  
States Catholic Conference

**NATIONAL CONFERENCE OF  
CHRISTIANS & JEWS** --- See National  
Conference The

National Conference Of Editorial  
Writers  
6223 Electra Blvd Rockvl --- 301 984-3015

National Conference Of Public  
Employees Retirement Systems  
1620 L St NW --- 429-2230

National Conference Of Puerto Rican  
Women 5 Thomas Circle NW --- 387-4716

National Conference Of State Historic  
Preservations Officers  
444 North Cap St --- 624-5465

National Conference Of State  
Legislatures 444 North Cap St --- 624-5400

National Conference On Public  
Employee Retirement Systems  
1518 K St NW --- 737-2926

National Conference On Soviet Jewry  
1640 R Ave NW --- 898-2500

National Conference On Women The  
Economy And Public Policy  
1090 W Ave NW Wash --- 842-3600

National Conference The  
1815 H St NW --- 822-6110

National Conference The  
1815 H St NW --- 887-0977

National Congress For Community  
Economic Development  
11 Dupont Cir NW --- 234-5009

National Congress For Men --- 328-4377

**NATIONAL CONGRESS OF  
AMERICAN INDIANS**  
2010 Mass Ave NW --- 466-7767

National Conservatory Of Dramatic  
Arts 1536 W Ave NW --- 333-2202

**NATIONAL CONSORTIUM FOR  
CHILD MENTAL HEALTH  
SERVICES** 3615 W Ave NW --- 966-7300

National Construction Industry  
Council 1919 Pa Ave NW --- 887-1494

National Constructors Association  
1730 M St NW --- 466-8880

National Consulting Group  
1400 20th St NW --- 833-8160

 **BELLSOUTH**

 **BELLSOUTH**

# Expand Your Marketing Potential

With BellSouth  
**Comprehensive**  
White Page Listing  
Information  
**Database.**

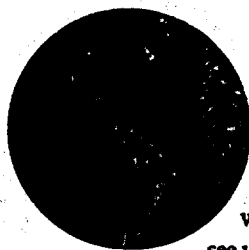
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BellSouth  
Directory Publishers Database Service



# BellSouth Directory Publishers Database Service

## Build Your Directory With Built-in Economy



Building a directory can be costly. Even for the most experienced Directory Publishers. Yet, you need to deliver quality, comprehensive information in order to remain competitive.

At BellSouth, we understand. After all, we're in a similar business. Which is why we see you as a partner. And why we're here to offer you the most comprehensive, accurate and up-to-date listings information—all at a price you can afford—just \$.04<sup>1</sup> per base file listing!

We can also provide you with updates on new business start-ups and established business listing changes!

Here's how it works. Simply by being a BellSouth Directory Publishers Database Service subscriber, you may also purchase our optional Weekly Business Activity Report. Then, every week, you'll be provided with an accurate and up-to-date printout of new listings or changes to existing listings of BellSouth customers in your base file. And rest assured, each new listing or listing change will contain complete information including listed name, address and telephone number.

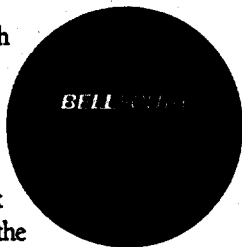
When it comes to increasing your sales of classified ad space, the Weekly Business Activity Report is the most cost-efficient new business tool available! Best of all, it's available from BellSouth, a name you know and trust.

### The Affordable Way To Build Your Business.

Introducing BellSouth Directory Publishers Database Service<sup>2</sup>. It's the perfect way to build your directory without building up tremendous costs in the process.

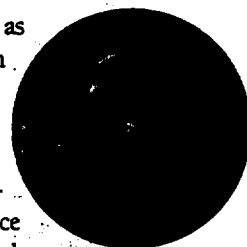
Simply subscribe to BellSouth Directory Publishers Database Service, and you'll be furnished with one of the most extensive databases in the South. Choose to receive it via magnetic tape or printed copy. Either way, the low cost remains the same. Yet it buys you all of the support of BellSouth, a leading provider of telephone service.

In fact, our listing of names, addresses, and telephone numbers for residences, businesses and government agencies in our nine-state region adds up to a whopping 17 million! That's because no one knows the South like BellSouth.



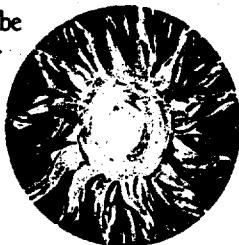
### When Accuracy and Reliability Are On The Line, Call BellSouth.

Making your business lucrative is as easy as making the right call. Call on BellSouth's economical BellSouth Directory Publishers Database Service and Weekly Business Activity Report to increase your sales and enhance your profits today. For more information, or to place your BellSouth Directory Publishers Database Service order, contact BellSouth Directory Publisher Relations at 1-800-615-0032.



### BellSouth Quality Is A Southern Tradition.

By building on BellSouth's reputation for excellent Southern coverage, you'll also be building quality into your system. For starters, your BellSouth Directory Publishers Database Service listings will contain all eligible listed names, addresses, and telephone numbers of BellSouth customers. But that's just the beginning.



<sup>1</sup>A \$100 processing fee will apply in non-tariffed states.

<sup>2</sup>BellSouth Directory Publishers Database Service and its optional Weekly Business Activity Report are provided solely for the compilation, production, publication, correction, and distribution of printed directories and/or for the sale or solicitation of advertising from business customers to be contained in a published directory. Nonpublished and nonlisted numbers as well as listings deleted by customer request will not be provided.

**THE COMMISSION HAS THE AUTHORITY TO PROMULGATE REGULATIONS  
IMPLEMENTING SECTION 222(e).**

**I. Introduction.**

The comments and record in CC Docket No. 96-115 demonstrate that implementing rules are necessary and desirable to give effect to Congress' intent in Section 222(e). As we see it, the record clearly establishes that rules should be adopted. The question this paper addresses is whether the Commission may adopt such rules. That question is precipitated by the Eighth Circuit's 18 July 1997 decision in Iowa Utilities Board v. FCC.<sup>1</sup> As shown below, the Commission's authority to adopt such rules is undisturbed by what we (and, we assume the Commission) perceive to be the erroneous ruling of the Eighth Circuit.

Section 222(e) presents a situation entirely different from that before the Eighth Circuit. Most notably, Section 222(e) is concerned with the promotion of competition in the classified telephone directory advertising and publication business (yellow pages). Furthermore, the statute contains no delegation to, let alone any mention of, state authority and therefore the Commission's jurisdiction is not at odds with any express grant to the states as was case in Iowa Utilities Bd. In any event, because the interstate and intrastate aspects of SLI are impossible to separate, the Commission -- in the event of any

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<sup>1</sup> 1997 WESTLAW 403401 (8th Cir. 1997).

such conflict -- would have authority to issue regulations under Section 222(e).

**II. The Commission's Authority Over Subscriber List Information Sold To Directory Publishers Is Not Confined By Section 2(b) Of The Act.**

Section 222(e) focuses on fostering competition in the unregulated classified telephone directory advertising market (yellow pages) and is not concerned with telecommunications services as such. As pointed out in ADP's comments in CC Docket No. 96-115, classified directory advertising is a more than \$10 billion per year industry. It is not surprising therefore that many LECs historically refused to provide their listings to independent directory publishers (a publisher unaffiliated with a LEC) or attached such onerous conditions to their provision so as to amount to a refusal to deal.<sup>2</sup> Those types of activities help explain why today LECs hold a 96% market share.<sup>3</sup> To promote competition in the classified directory advertising market, Congress enacted Section 222(e).

Section 222(e) requires LECs and CLECs to provide subscriber list information -- defined in Section 222(f) as name, address, telephone number, and "primary advertising classification" -- on

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<sup>2</sup> In its comments, reply comments, and ex parte filings in CC Docket 96-115, ADP has supplied the Commission with numerous historical and more recent accounts of anticompetitive behavior by LECs. See also Floor statement of Rep. Barton, 141 Cong. Rec. H8498 (daily ed. Aug. 4, 1995).

<sup>3</sup> See Floor statements of Rep. Barton, 141 Cong. Rec. H8498 (daily ed. Aug. 4, 1995) (discussing anticompetitive behavior by LECs); 142 Cong. Rec. H. 1160 (daily ed. Feb. 1, 1996) (same).

reasonable and nondiscriminatory rates, terms, and conditions to any entity wishing to publish a directory in any format. The inclusion of "primary advertising classifications" makes plain that Section 222(e) is aimed at the classified directory market. Indeed, the Conference Report<sup>4</sup> -- which is the most persuasive evidence of congressional intent next to the statute itself<sup>5</sup> -- expressly states that Section 222(e) was premised on "guarantee[ing] independent publishers access to subscriber list information at reasonable and nondiscriminatory rates, terms and conditions." Individual floor statements by two members of the conference committee further demonstrate that Congress intended Section 222(e) to open competition in the classified directory publishing market.<sup>6</sup>

In light of the above, Section 222(e) is not implicated by the "fence" of Section 2(b). That fence reaches only matters that are "for or in connection with intrastate communication service by wire or radio." Subscriber list information, for purposes of Section 222(e), is not such a matter. As shown above, Section 222(e) is concerned with the ability of independent directory publishers to acquire SLI for the purposes of soliciting yellow pages advertisements and publishing and

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<sup>4</sup> See H. R. Conf. Rep. No. 230, 104th Cong., 2d Sess. 205 (1996).

<sup>5</sup> See Sutherland Statutory Construction § 48.08 (5th ed.).

<sup>6</sup> See Floor statement of Rep. Bill Paxon, 142 Cong. Rec. E184 (daily ed. Feb. 6, 1996); Floor statement of Rep. Joe Barton, 142 Cong. Rec. H1160 (daily ed. Feb. 1, 1996).

distributing of the classified directories. Thus, while it is true that SLI may be gathered in conjunction with LECs' offering of telephone service, the sale of SLI to directory publishers for purposes of advertising solicitation and directory distribution cannot conceivably fall within the Section 2(b) fence.

Consequently, Section 2(b) is of no relevance to the Commission's authority to issue rules implementing Section 222(e).

**III. Even If Section 2(b) Were Applicable, The Impossibility Exception Allows The Commission To Issue Regulations Covering SLI For Purposes Of Section 222(e).**

Although ADP believes that Section 2(b) has no impact upon the Commission's authority under Section 222(e), the following discussion shows that even if Section 2(b) applied, the Commission would still possess regulatory authority based on the impossibility exception.

**A. Overview Of Section 2(b) And The Impossibility Exception.**

The Communications Act ("Act") establishes "a system of dual state and federal regulation over telephone service."<sup>7</sup> Under Section 1 of the Act, 47 U.S.C. § 151, "[i]nterstate communications are totally entrusted to the FCC," which is charged with providing a "rapid, efficient, Nation-wide" wire and radio communications service.<sup>8</sup> Regulatory authority over "charges, classifications, practices, services, facilities, or

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<sup>7</sup> Louisiana PSC v. FCC, 476 U.S. 355, 360 (1986).

<sup>8</sup> National Ass'n of Reg. Util. Comm'rs v. FCC, 746 F.2d 1492, 1498 (D.C. Cir. 1984) (quoting 47 U.S.C. § 151).

regulations for or in connection with intrastate communications services by wire or radio of any carrier" is withheld from the Commission pursuant to Section 2(b) of the Act, 47 U.S.C. § 152(b).

Although Sections 1 and 2 superficially seem to create two distinct spheres of regulation, the Supreme Court has recognized that "the realities of technology and economics" blur the boundary line between federal and state regulatory domains.<sup>9</sup> For example, virtually all telephone plant that is used to provide interstate service also is used to provide intrastate service.<sup>10</sup> Thus, regulation of telephone lines and equipment almost inevitably affects both interstate and intrastate communications.<sup>11</sup> Consequently, Section 2(b) "does not create a simple division; rather, it creates a persistent jurisdictional tension."<sup>12</sup>

In recognition of that tension, the Supreme Court in Louisiana PSC stated that the Commission may issue regulations impacting upon intrastate matters only when the matter has

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<sup>9</sup> Louisiana PSC, 476 U.S. at 360. See also Public Utility Comm'n of Texas v. FCC, 886 F.2d 1325, 1329 (D.C. Cir. 1989) ("Texas PUC").

<sup>10</sup> Louisiana PSC, 476 U.S. at 360.

<sup>11</sup> See, e.g., Texas PUC, 886 F.2d at 1333-1335; North Carolina Utils. Comm'n v. FCC, 552 F.2d 1036 (4th Cir.) ("NCUC II"), cert. denied, 434 U.S. 874 (1977); North Carolina Utils. Comm'n v. FCC, 537 F.2d 787 (4th Cir.) ("NCUC I"), cert. denied, 429 U.S. 1027 (1976).

<sup>12</sup> Public Serv. Comm'n of Md. v. FCC, 909 F.2d 1510, 1514 (D.C. Cir. 1990) ("Maryland PSC").

interstate aspects as well and it is "not possible to separate the interstate and intrastate components of the asserted FCC regulation."<sup>13</sup> As examples of the "impossibility" exception to Section 2(b), the Court cited the 4th Circuit's decisions in NCUC I and NCUC II.

As made plain in NCUC I, the impossibility exception does not require that compliance with different state and federal rules be physically impossible; it is enough that compliance with both sovereigns is not possible as a practical matter. For that reason, the court upheld the Commission's decision to promote competition in the customer-premises equipment ("CPE") market by preempting state regulations prohibiting telephone subscribers from attaching a non-telephone-company phone to the telephone network unless the phone was used exclusively for interstate service.<sup>14</sup> The court found that telephones (CPE) are used jointly for intrastate and interstate communications and therefore a requirement that their use be limited to one or the other was a "practical and economic impossibility."

In NCUC II, the 4th Circuit reaffirmed its NCUC I holding and rejected the notion that intrastate facilities were those used "predominantly" for local communications. The court explained that such a test would deny the Commission jurisdiction over any jointly used property.<sup>15</sup> The fact that almost all CPE

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<sup>13</sup> 476 U.S. at 375 n.4.

<sup>14</sup> 537 F.2d at 790-96.

<sup>15</sup> 552 F.2d at 1045-49.

is used predominantly for local communications, held the court, should not be "confuse[d]" with the "statutory division of decisionmaking power."<sup>16</sup> According to the court, Congress did not create a regulatory scheme "that depends on the calling habits of telephone subscribers to determine the jurisdictional competence of the FCC versus state utility commissions."<sup>17</sup> In short, the fact that CPE was used predominantly for intrastate calls did not mean that the Commission was without preemption power under the impossibility exception.

**B.    The Iowa Utilities Bd. Decision.**

In Iowa Utilities Bd., the Eighth Circuit held that the Commission had exceeded its jurisdiction in promulgating various rules pursuant to the local competition provisions, 47 U.S.C. § 251(c)(2)-(4), of the Communications Act ("Act")<sup>18</sup> which, on their face, divide various regulatory responsibilities between the Commission and the states. Looking to the statute's plain language, the court concluded that it "directly grant[ed]" and "undeniably authorize[d]" the grant of pricing authority to the states. Finding no similar express authorization to the Commission, the court held that the statute's plain language did

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<sup>16</sup>    Id. at 1046.

<sup>17</sup>    Id.

<sup>18</sup>    The local competition provisions, which require incumbent LECs to provide competitors with (1) interconnection, (2) access to unbundled network elements, and (3) certain telecommunications services priced at wholesale rates.



not empower the agency to issue its local competition pricing rules.

The impossibility doctrine, held the court, was likewise unavailable because the express statutory grant to the states demonstrated that Congress did not intend for the Commission to have any authority, let alone preemption authority.<sup>19</sup> In reaching that conclusion, the court observed that its decision was one of first impression because:

none of the courts invoking the impossibility exception had the assistance of a federal statute that specifically determined who had jurisdiction over the telecommunications area at issue, those courts had to resort to analyzing the interstate/intrastate character of the telecommunications services, as required by Sections 151 and 152 of the Communications Act, in order to make such a determination. Here, however, subsections 252(c)(2) and 252(d) clearly assign jurisdiction . . . to the state commissions, thus avoiding the need to analyze the interstate/intrastate character of these services.<sup>20</sup>

In dicta, the court conducted what it called "a traditional analysis of the interstate/intrastate quality of the local competition provisions."<sup>21</sup> It concluded that the subject matter of those provisions -- interconnection, unbundled access, resale, and transport, etc. -- were "fundamentally intrastate in character" and thus state regulation could not negate the

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<sup>19</sup> Iowa Utilities Bd., 1997 WESTLAW 403401 at \*8. The court also observed that ratemaking was generally capable of being separated into its intrastate and interstate components. Id. However, the court did not make any conclusion concerning the separability of the provisions before it.

<sup>20</sup> Id. \*7-8.

<sup>21</sup> Id. at \*9.